

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

PATTI H. MENDERS, et al.,

Plaintiffs,

v.

LOUDOUN COUNTY SCHOOL BOARD,

Defendant.

)
)
)
)
)
)
)
)
)
)

Case No. 1:21-cv-669-AJT-TCB

DECLARATION OF LOTTIE SPURLOCK

Pursuant to 28 U.S.C. § 1746, Lottie Spurlock declares as follows:

1. I am over 18 years old and have personal knowledge of the facts described herein.
2. I am employed by the Loudoun County School Board (“Loudoun County Public Schools” or “LCPS”) in the Office of Equity. My title is Director of Equity.
3. The bias reporting form that is the subject of this lawsuit was an online form that allowed students to anonymously share their experiences regarding issues of racism, injustice, and inequity.
4. The purpose of collecting the information on the bias reporting form was to identify issues and generate discussion points for the “Share, Speak Up, Speak Out” meetings held with the Student Equity Ambassadors.
5. The link to the online bias reporting form was disseminated to principals in the spring of 2021.
6. Any time the online bias reporting form was completed and submitted; the responses were accessible to the Office of Equity.

7. During the spring of 2021, the Office of Equity received approximately 52 completed bias reporting forms.

8. While the intent of the bias reporting form was to identify issues for discussion at the “Share, Speak Up, Speak Out” meetings, the submitted forms were ultimately not effective in identifying discussion issues because the responses were either duplicative of issues already identified by the Office of Equity, contained information that was off topic, and/or contained insufficient detail to permit meaningful discussion.

9. I discontinued all use of the bias reporting form in the summer of 2021.

10. The link to the bias reporting form was not disseminated again and the Equity Office discontinued any use of the form.

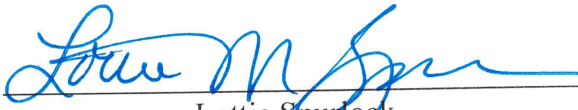
11. None of the bias reporting forms submitted during the 2020-2021 school year resulted in any formal investigation or disciplinary action.

12. The bias reporting form was not replaced with any similar reporting form or any other mechanism.

13. Neither LCPS nor the Office of Equity has utilized the bias reporting form for the last two school years (2021-2022 and 2022-2023) and there is no intent to reinstate or replace the bias reporting form with any similar reporting form or any other mechanism.

I declare under penalty of perjury that the following is true and correct.

Executed on June 14, 2023.


Lottie Spurlock